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EE BRANCH REVIEW

IN 12-11-79 OUT 12/19/79

FILE OR REG. NO. 7969-LG  
PETITION OR EXP. PERMIT NO. 9F2205  
DATE DIV. RECEIVED 12-11-79  
DATE OF SUBMISSION \_\_\_\_\_  
DATE SUBMISSION ACCEPTED \_\_\_\_\_  
TYPE PRODUCTS(S): I, D, H, F, N, R, S \_\_\_\_\_  
DATA ACCESSION NO(S) . \_\_\_\_\_  
PRODUCT MGR. NO. 21 - Jacoby  
PRODUCT NAME(S) RONILAN  
COMPANY NAME BASF Wyandotte Corp.  
SUBMISSION PURPOSE ~~Review~~ Rebuttal of Registration  
Requirement  
CHEMICAL & FORMULATION Vinclozolin

December 18, 1979

Avian Reproduction Requirements for Ronilan<sup>R</sup>

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As stated in the proposed Guidelines, avian reproduction studies are required when birds will be repeatedly exposed to a pesticide for prolonged periods of time, especially during breeding season. Accordingly, avian reproduction studies were required prior to final concurrence on registration of vinclozolin (Ronilan<sup>R</sup>) for multiple application on strawberries (J.S. Leitzke, 10/16/79). It was also suggested that since appropriate test levels would depend on both current and future crop registrations, the registrant may wish to contact EEB to help determine test levels for all foreseeable crop registrations.

However, this was not intended to be construed as a denial of registration. While strawberries are a very desirable food item for birds, it is recognized that acreage is not extensive and is widely scattered. Besides, appropriate test levels applicable for possible future registrations have yet to be determined.

J. Leitzke: emg 12-19-79 TS-769, CM2, RM807, (77725)

Therefore, EEB does not object to the conditional registration of Ronilan<sup>R</sup> on strawberries subject to written agreement to the following conditions:

- 1) That avian reproduction studies be run at test levels, yet to be determined, that will be appropriate for both strawberries and future crop registrations; and
- 2) That if the avian reproduction test indicates significant impairment at certain test levels, then registration on any crop on which similar levels are found or expected will be withdrawn or denied.